

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
ANTHONY DEO individually and as shareholder/member  
of NORTSHORE MOTOR LEASING LLC and 189  
SUNRISE HWY AUTO LLC; SARA DEO individually  
and as shareholder/member of NORTSHORE MOTOR  
LEASING LLC and 189 SUNRISE HWY AUTO LLC;  
and NORTSHORE MOTOR LEASING LLC and 189  
SUNRISE AUTO LCC,

**STIPULATION**

Plaintiffs,

Civ. Case No. 2:24-cv-06903

-against-

RONALD BARON, JOSHUA AARONSON, JORY BARON  
MARCELLO SCIARRINO, DANIEL O'SULLIVAN, BRIAN  
CHABRIER, WENDY KWUN, IRIS BARON, RAYMOND  
PHELAN, ASAD KHAN, ESTATE OF DAVID BARON,  
BARON NISSAIN INC., d/b/a BARON NISSAN, ISLAND  
AUTO GROUP OF NEW YORK LLC, a/k/a ISLAND AUTO  
GROUP OF NY LLC, d/b/a ISLAND AUTO GROUP, ROBERT  
ANTHONY URRUTIA, BRUCE NOVICKY, MICHAEL  
MORGAN PARMESHWAR BISSOON, SUPERB MOTORS  
INC., d/b/a TEAM AUTO DIRECT, RICHARDS, WITT &  
CHARLES, LLP, CITRIN COOPERMAN & COMPANY  
LLP, d/b/a CITRIN COOPERMAN, NEXTGEAR CAPITAL  
INC., ALLY FINANCIAL INC., NISSAN MOTOR  
ACCEPTANCE COMPANY LLC, d/b/a NMAC, JP MORGAN  
CHASE BANK N.A., a/k/a JP MORGAN CHASE & CO., a/k/a  
CHASE BANK N.A., d/b/a CHASE BANK, CYRULI, SHANKS  
& ZIZMOR, LLP, MILMAN LABUDA LAW GROUP, PLLC,  
JOHN DOE ATTORNEYS 1-20, JOHN DOE ACCOUNTANTS  
1-20, JOHN DOES 1-20, JANE DOES 1-20, JOHN DOE  
CORPORATIONS 1-20, and NEW YORK STATE  
DEPARTMENT OF MOTOR VEHICLES,

Defendants.

-----X  
**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned that  
the time for Defendant Richard, Witt & Charles, LLP ("RWC") to answer, respond or otherwise



plead and/or move with respect to Plaintiffs' Complaint dated September 4, 2024, is hereby extended up to and including November 18, 2024.

**IT IS FURTHER STIPULATED AND AGREED** that RWC waives any defense concerning the sufficiency of service of Plaintiffs' Summons and Complaint.

**IT IS FURTHER STIPULATED AND AGREED** that fax or electronic signatures shall be deemed originals for the purpose of this Stipulation and that a fax or electronic copy of this Stipulation may be filed with the clerk and used for all purposes.

Dated: Purchase, New York  
October 1, 2024

HARRY THOMASSON, ESQ.

By: 

Harry Thomasson, Esq.  
*Attorneys for Plaintiff*  
3280 Sunrise Highway  
Box 112  
Wantagh, New York 11793  
(516) 557-5459  
[hrtatty@verizon.net](mailto:hrtatty@verizon.net)

MILBER MAKRIS PLOUSADIS &  
SEIDEN, LLP

By: 

Conor V. McDonald, Esq.  
*Attorneys for Defendant*  
*Richard, Witt & Charles, LLP*  
100 Manhattanville Road, Suite 4E20  
Purchase, New York 10577  
(914) 687-8700  
[cmcdonald@milbermakris.com](mailto:cmcdonald@milbermakris.com)